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Counsel for American Federation of  
Television and Radio Artists

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

|                         |   |                    |
|-------------------------|---|--------------------|
| In re:                  | ) |                    |
|                         | ) | Chapter 7          |
| Air America Media, LLC, | ) |                    |
|                         | ) | Case No.: 10-10615 |
| Debtor.                 | ) |                    |

NOTICE OF APPEARANCE AND REQUEST FOR NOTICE

PLEASE TAKE NOTICE that pursuant to Rules 2002 and 9010(b) of the Rules of Bankruptcy Procedure, the undersigned attorneys appear for the American Federation of Television and Radio Artists (“AFTRA”), creditor and party in interest in this case, and request that all notice given or required to be given in this action and all related actions, be given and served upon the following:

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PLEASE TAKE FURTHER NOTICE that the foregoing request includes not only the notices and papers, whether formal or informal, *ex parte* or on notice, written or oral, referred to in the Bankruptcy Rules and Code sections specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telecopier or otherwise, which affect or seek to affect in any way any rights or interests of the Debtor.

PLEASE TAKE FURTHER NOTICE that neither this Notice of Appearance nor any later appearance, pleading, claim, or suit shall waive the right to have final orders in noncore matters entered only after *de novo* review by a District Court Judge; or the right to trial by jury in any proceeding related to this case; or the right to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; or to adjudicate rights in another applicable forum, or any other rights, claims, actions, defenses, setoffs, or recoupments to which the entities are or may be entitled under agreements, in law or in equity, all of which rights are expressly reserved.

Dated: February 3, 2010

Respectfully submitted,

/s/ Joshua Ellison  
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(212) 563-4100

Attorneys for AFTRA

**CERTIFICATE OF SERVICE**

I hereby certify that on this 3rd day of February, 2010, I caused a true and correct copy of the foregoing **Notice of Appearance and Request for Notice** to be duly served by electronic mail on all parties via the United States Bankruptcy Court's E-Filing Notification and upon on the parties listed below by first class mail, postage pre-paid:

Office of the United States Trustee  
33 Whitehall Street, 21st Floor  
New York, NY 10004

Burton S. Weston  
Garfunkel Wild, P.C.  
111 Great Neck Road  
Great Neck, NY 11021

/s/ Joshua Ellison  
\_\_\_\_\_  
Joshua Ellison